

P. O. Box 175 • 210 E Tuskeena Street • Hayneville, Alabama 36040

Phone: (334) 548-2101 Fax: (334) 548-2051

July 6, 2018

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RE: Hayneville Telephone Company, Inc.'s Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Hayneville Telephone Company, Inc.'s ("Hayneville") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that, in accordance with 47 C.F.R. § 54.313 and the Commission's Further Report and Order of September 27, 2016, in Docket No. 25980, Hayneville has submitted copies of the FCC Form 481 filed with the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") for the program year 2018, to the Commission's Utility Services Division under separate cover.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (334) 371-3008.

Very truly yours,

Evelyn P. Causey

President and Chief Operations Officer

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the previous high-cost funding mechanisms. applicable to telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Hayneville Telephone Company, Inc. ("Hayneville") certifies that it has timely filed its Form 481 for the program year 2019 with the FCC and USAC. Hayneville further certifies that all federal high-cost support provided to Hayneville was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Hayneville respectfully requests that the Commission notify the FCC prior to October 1 of this year that Hayneville is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (334) 371-3008.

Respectfully Submitted,

HAYNEVILLE TELEPHONE COMPANY, INC.
By: Culot Causes
Evelyn I Causey
As Its: President and Chief Operations Officer
Date: 7/6/18



July 3, 2018

### VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RE: Hopper Telecommunications LLC's Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Hopper Telecommunications LLC's ("Hopper") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Hopper is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in Connect America Fund; ETC Annual Reports and Certifications, Report and Order, 32 FCC Rcd 5944 (2017) ("ETC Reporting Streamlining Order") and In the Matter of Connect America Fund, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (256) 586-1420.

Very truly yours,

Dennis K. Andrews Senior Vice President

Alemi K. Chili

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform - Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Hopper Telecommunications LLC ("Hopper") certifies its compliance in filing its FCC Form 481 for the program year 2019 as required. Hopper further certifies that all federal high-cost support provided to Hopper was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Hopper respectfully requests that the Commission notify the FCC prior to October 1 of this year that Hopper is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (256) 586-1420.

Respectfully Submitted,

HOPPER TELECOMMUNICATIONS LLC

By: Leuin K. Ohd

Dennis K. Andrews

As Its: Senior Vice President

Date: July 3, 2018



June 25, 2018

VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RE: Knology Total Communications, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone's Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Knology Total Communications, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone's ("Knology Total") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy of this filing will be delivered to the Commission.

Please be further advised that Knology Total is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in Connect America Fund; ETC Annual Reports and Certifications, Report and Order, 32 FCC Rcd 5944 (2017) ("ETC Reporting Streamlining Order") and In the Matter of Connect America Fund, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact Arlene Morgan at (706) 645-8116.

Very truly yours,

Bruce Schoonove

Vice President – Regulatory Compliance Knology, Inc., parent company of

Knology Total Communications, Inc.



In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Knology Total Communications, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone ("Knology Total") certifies its compliance in filing its FCC Form 481 for the program year 2019 as required. Knology Total further certifies that all federal high-cost support provided to Knology Total was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Knology Total respectfully requests that the Commission notify the FCC prior to October 1 of this year that Knology Total is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Arlene Morgan at (706) 645-8116.

Respectfully Submitted,

KNOLOGY TOTAL COMMUNICATIONS, INC.

d/b/a KNOLOGY or d/b/a WOW! INTERNET, CABLE

AND PHONE

Brice Schoonover

As Its: Vice President – Regulatory Compliance Knology, Inc., parent company of Knology Total Communications, Inc.

Date: 6/25/18



June 25, 2018

## VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RE: Knology of the Valley, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone's Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Knology of the Valley, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone's ("Knology of the Valley") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2018, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy of this filing will be delivered to the Commission.

Please be further advised that Knology of the Valley is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in Connect America Fund; ETC Annual Reports and Certifications, Report and Order, 32 FCC Red 5944 (2017) ("ETC Reporting Streamlining Order") and In the Matter of Connect America Fund, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact Arlene Morgan at (706) 645-8116.

Very truly yours,

Bruce Schoonover

Vice President – Regulatory Compliance

Knology, Inc., parent company of Knology of the Valley, Inc.



In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Knology of the Valley, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone ("Knology of the Valley") certifies its compliance in filing its FCC Form 481 for the program year 2019 as required. Knology of the Valley further certifies that all federal high-cost support provided to Knology of the Valley was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Knology of the Valley respectfully requests that the Commission notify the FCC prior to October 1 of this year that Knology of the Valley is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Arlene Morgan at (706) 645-8116.

Respectfully Submitted,

KNOL or d/b/	OGY OF THE VALLEY, INC. d/b/a KNOLOGY WOW! INTERNIT, CABLE AND PHONE
By:	
As Its:	Bruce Schoonover Vice President – Regulatory Compliance
	Knology, Inc., parent company of
	Knology of the Valley, Inc.

Date:	6/25	18
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## Millry Telephone Company, Inc.

PO Box 561 30433 Highway 17 Millry, Alabama 36558 251 846-2911

July 5, 2018

## VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RE: Millry Telephone Company, Inc.'s Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Millry Telephone Company, Inc.'s ("Millry") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Millry is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("ETC Reporting Streamlining Order") and In the Matter of Connect America Fund, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact Annice Jordan at (251) 846-2911.

Very truly yours,

Paul E. Brown, Jr. Vice President

Paul B

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform - Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the applicable to previous high-cost funding mechanisms. requirements telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Millry Telephone Company, Inc. ("Millry") certifies its compliance in filing its FCC Form 481 for the program year 2019 as required. Millry further certifies that all federal high-cost support provided to Millry was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Millry respectfully requests that the Commission notify the FCC prior to October 1 of this year that Millry is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Annice Jordan at (251) 846-2911.

Respectfully Submitted,

MILLRY TELEPHONE COMPANY, INC.

By: Paul E. Brown, Jr.
As Its: Vice President

Date: 7-5-2018



July 3, 2018

## VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RE: Mon-Cre Telephone Cooperative, Inc.'s Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Mon-Cre Telephone Cooperative, Inc.'s ("Mon-Cre") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Mon-Cre is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("ETC Reporting Streamlining Order") and In the Matter of Connect America Fund, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact Teresa Rich at (334) 562-3242.

Very truly yours

Walt Sellers President

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform - Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the applicable high-cost funding mechanisms. Eligible requirements to previous telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Mon-Cre Telephone Cooperative, Inc. ("Mon-Cre") certifies compliance in filing its FCC Form 481 for the program year 2019 as required. Mon-Cre further certifies that all federal high-cost support provided to Mon-Cre was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Mon-Cre respectfully requests that the Commission notify the FCC prior to October 1 of this year that Mon-Cre is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Teresa Rich at (334) 562-3242.

Respectfully Submitted,

MON-CRE TELEPHONE COOPERATIVE, INC.

Зу: \_\_\_\_

Walt Sellers

As Its: President

Date:

3 2018



July 2, 2018

## **VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RE: Moundville Telephone Company, Inc.'s Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Moundville Telephone Company, Inc.'s ("Moundville") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Moundville is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in Connect America Fund; ETC Annual Reports and Certifications, Report and Order, 32 FCC Rcd 5944 (2017) ("ETC Reporting Streamlining Order") and In the Matter of Connect America Fund, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (205) 371-9011.

Very truly yours

R Scott Taylor

President/General Manager



In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform - Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Moundville Telephone Company, Inc. ("Moundville") certifies its compliance in filing its FCC Form 481 for the program year 2019 as required. Moundville further certifies that all federal high-cost support provided to Moundville was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Moundville respectfully requests that the Commission notify the FCC prior to October 1 of this year that Moundville is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to me at (205) 371-9011.

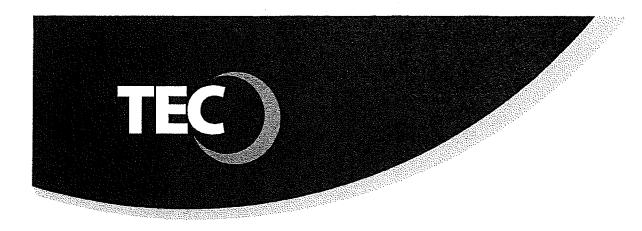
Respectfully Submitted,

MOUNDVILLE TELEPHONE COMPANY, INC.

y: \_\_\_\_\_\_\_

Scoff Taylor

As Its: President/General Manager



June 25, 2018

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RE: APSC Certification of Eligibility to Receive High Cost Support

Pursuant to 47 C.F.R. §54.314; APSC Docket 25980

Dear Mr. Thomas:

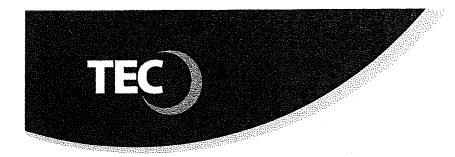
In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached the certification of National Telephone of Alabama, Inc. dba Cherokee Telephone Company marketing under TEC (the "Company") that the Company is eligible to continue to receive support from the Connect America Fund ("CAF"). If any additional information is required, please contact me at (601) 354-9070.

Very truly yours,

Lisa Wigington

Director of Revenue Assurance
And Regulatory Compliance

Enclosure (1)



In its December 20, 2001 and September 27, 2011 Orders in APSC Docket 25980, this Commission determined that it could best meet its monitoring and certification obligations by requiring the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review and each of the "rural LEC Average Schedule Companies" to file with the Commission a copy of NECA's proposed annual USF-HCLS and USF-LSS amounts for review. Pursuant to the Order, the Company's requirement to provide the Commission with a copy of its most recent annual interstate cost separation study, and estimated 2017-2018 Connect America Fund (CAF) ICC Support, which includes USF-LSS has been superseded by the requirement to file the attached FCC form 481.

National Telephone of Alabama, Inc. hereby certifies that it has used the federal high-cost support in the preceding calendar year and will use the funds for the upcoming calendar year for the provision, maintenance and upgrading of facilities and service for which such support is intended.

The Company hereby certifies that it has submitted via annual NECA filings, expenditures in support of its universal service filing. USF disbursements received by the Company and other rural incumbent local exchange companies that require state commission certification are divided into **three categories**: High Cost Loop Support ("HCLS"); Safety Net Additive Support ("SNAS"), and the Connect America Fund ("CAF"). The FCC in conjunction with the Federal-State Joint Board on Universal Service has created each of the above mechanisms. This means that representatives from State Commissions have also been involved in the development of these mechanisms through their representation in the Joint Board process.

The Company elected to receive Alternative Connect America Cost Model ("A-CAM") funding beginning in January 2017. This funding was made available by the FCC by WC Docket No. 10-90, Connect America Fund to further the goal of providing robust broadband access throughout the nation. The model support must be elected by state and therefore is distributed to both the Company and its Alabama affiliate Roanoke Telephone Company, Inc. evenly by month over a 10-year period. The total for the two Alabama ILECs amounts to \$1.05 million annually. In May of 2018, the FCC extended a second offer for ACAM participants to fully fund the ACAM model which increased the total 10-year funding to \$1.23 million annually with a true up payable in 2018. Electing to receive the A-CAM funding requires that the Company build out cable plant to rural areas to provide a certain level of broadband internet within the funded locations. The first milestone of the buildout obligation will occur at the end of year 4 or 2020 in which 40% of the funded locations could be provided 25/3, 10/1 or 4/1 Mbps internet service. The Company has elected A-CAM and is no longer able to receive High Cost Loop Support or Interstate Common Line Support as of 2017.

The Company further certifies that it will only use the remaining CAF ICC Support it receives during 2018-2019 for the continued provision, maintenance and upgrading of facilities and service for which such support is intended as described in 47 C.F.R. § 54.101. Those services, which are available to any customer in the Company's service area are: single-party voice grade access to the public switched network, unlimited local usage, dual-tone multi-frequency signaling or its functional equivalent, access to emergency services, including 9-1-1 service or enhanced 9-1-1 service, access to operator service, access to interexchange service, and access to directory assistance, and toll limitation for qualifying low-income customers.

All of these programs are administered through USAC, a private, not-for-profit corporation. USAC assists NECA in data collection necessary for the remittance of universal service funds. This means each company submits, no less frequently than annually, detailed information requested by NECA in the USF data collection process necessary for the remittance of universal service funds.

Rural ILECs must attest to the information submitted. Further, NECA and its auditors must attest to the validity and integrity of NECA's process. In other words, the ILEC cost studies and responses to data collection requests are subject to audit. The information provided in response to all of the universal service fund mechanisms utilizes FCC accounts for regulated costs and must be in compliance with FCC rules in Parts 32, 36, 54 and 64.

All cost studies submitted by rural ILECs and all USF funding received by rural ILECs must be based upon financial statements. In addition, NECA performs focus reviews of cost studies as well as the USF fillings for the cost companies involved in the NECA process. In addition, an officer of the rural ILEC must certify to the accuracy and validity of the filed information.

Any questions regarding this submission or the underlying documentation previously submitted to the Commission should be directed to James Garner at (601) 354-9070.

Respectfully Submitted,

NATIONAL TELEPHONE OF ALABAMA, INC.

James Garner

As Its: Vice President of Operations

Date: June 25, 2018



Your Communications Connection 5415 Main Drive P.O. Box 452 New Hope, AL 35760 (256) 723-4211

July 10, 2018

#### VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RE: New Hope Telephone Cooperative, Inc.'s Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing New Hope Telephone Cooperative, Inc.'s ("New Hope") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that New Hope is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in Connect America Fund; ETC Annual Reports and Certifications, Report and Order, 32 FCC Rcd 5944 (2017) ("ETC Reporting Streamlining Order") and In the Matter of Connect America Fund, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (256) 723-4211.

Very truly yours,

Jim Cook

General Manager



Your Communications Connection 5415 Main Drive P.O. Box 452 New Hope, AL 35760 (256) 723-4211

#### CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the previous high-cost funding mechanisms. applicable to requirements telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, New Hope Telephone Cooperative, Inc. ("New Hope") certifies its compliance in filing its FCC Form 481 for the program year 2019 as required. New Hope further certifies that all federal high-cost support provided to New Hope was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

New Hope respectfully requests that the Commission notify the FCC prior to October 1 of this year that New Hope is eligible to receive federal high-cost support in 2019. Any

questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Jim Cook at (256) 723-4211.

Respectfully Submitted,

NEW HOPE TELEPHONE COOPERATIVE, INC.

Sy: // Whitelear

As Its: President

Date: 1/10/18



July 3, 2018

## VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RE: Otelco Telephone, LLC's Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC

Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Otelco Telephone, LLC's ("Otelco") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Otelco is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("ETC Reporting Streamlining Order") and In the Matter of Connect America Fund, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (256) 586-1420.

Very truly yours,

Dennis K. Andrews Senior Vice President

Denni K. Onde

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform - Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Otelco Telephone, LLC ("Otelco") certifies its compliance in filing its FCC Form 481 for the program year 2019 as required. Otelco further certifies that all federal high-cost support provided to Otelco was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Otelco respectfully requests that the Commission notify the FCC prior to October 1 of this year that Otelco is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (256) 586-1420.

Respectfully Submitted,

OTELCO TELEPHONE, LLC

By: Meuni K. Oud

As Its: Senior Vice President )
Date: Quy 3, 2018



July 5, 2018

## **VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RE:

Pine Belt Telephone Company, Inc.'s Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314;

APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Pine Belt Telephone Company, Inc.'s ("Pine Belt") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Pine Belt is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in *Connect America Fund*; ETC Annual Reports and Certifications, Report and Order, 32 FCC Rcd 5944 (2017) ("ETC Reporting Streamlining Order") and In the Matter of Connect America Fund, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (334) 385-2106.

Very truly yours,

- Educk

John C. Nettles

President



In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform - Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the previous high-cost funding mechanisms. Eligible requirements applicable to telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Pine Belt Telephone Company, Inc. ("Pine Belt") certifies its compliance in filing its FCC Form 481 for the program year 2019 as required. Pine Belt further certifies that all federal high-cost support provided to Pine Belt was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Pine Belt respectfully requests that the Commission notify the FCC prior to October 1 of this year that Pine Belt is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (334) 385-2106.

Respectfully Submitted,

PINE BELT TELEPHONE COMPANY, INC.

John/C. Nettles

As Its: President

Date: 7/2/2018

MATTHEW JACKSON PRESIDENT

TIM FORD



STEPHANIE JACKSON VICE PRESIDENT

DOYLE KAY PLANT SUPERVISOR

# Ragland Telephone Co., Inc.

POST OFFICE BOX 577 RAGLAND, ALABAMA 35131 205-472-2141 FAX 205-472-2145

7/3/,2018

VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RE: Ragland Telephone Company, Inc.'s Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Ragland Telephone Company, Inc.'s ("Ragland") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Ragland is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in Connect America Fund; ETC Annual Reports and Certifications, Report and Order, 32 FCC Rcd 5944 (2017) ("ETC Reporting Streamlining Order") and In the Matter of Connect America Fund, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact Rod Ballard at Jackson Thornton & Co., P.C. at (334) 240-3622.

Matthew Jackson

President

MATTHEW JACKSON PRESIDENT

TIM FORD SECRETARY



STEPHANIE JACKSON VICE PRESIDENT

DOYLE KAY PLANT SUPERVISOR

## Ragland Telephone Co., Inc.

POST OFFICE BOX 577 RAGLAND, ALABAMA 35131 205-472-2141 FAX 205-472-2145

#### CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform - Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92. 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the previous high-cost funding mechanisms. applicable to requirements telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Ragland Telephone Company, Inc. ("Ragland") certifies its compliance in filing its FCC Form 481 for the program year 2019 as required. Ragland further certifies that all federal high-cost support provided to Ragland was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

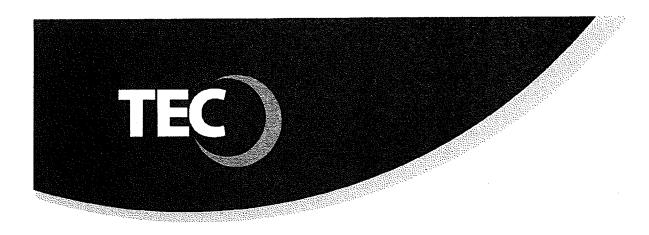
Ragland respectfully requests that the Commission notify the FCC prior to October 1 of this year that Ragland is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Rod Ballard at Jackson Thornton & Co., P.C. at (334) 240-3622.

Respectfully Submitted,

RAGLAND TELEPHONE COMPANY, INC.

Matthew Jackson
As Its: President

Date:



June 25, 2018

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RF:

APSC Certification of Eligibility to Receive High Cost Support

Pursuant to 47 C.F.R. §54.314; APSC Docket 25980

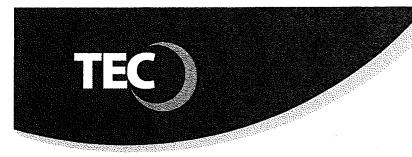
Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached the certification of Roanoke Telephone Company, Inc. marketing under TEC (the "Company") that the Company is eligible to continue to receive support from the Connect America Fund ("CAF"). If any additional information is required, please contact me at (601) 354-9070.

Very truly yours

Director of Revenue Assurance and Regulatory Compliance

Enclosure (1)



In its December 20, 2001 and September 27, 2011 Orders in APSC Docket 25980, this Commission determined that it could best meet its monitoring and certification obligations by requiring the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review and each of the "rural LEC Average Schedule Companies" to file with the Commission a copy of NECA's proposed annual USF-HCLS and USF-LSS amounts for review. Pursuant to the Order, the Company's requirement to provide the Commission with a copy of its most recent annual interstate cost separation study, annual 2017 USF-HCLS, and estimated 2016-2017 Connect America Fund (CAF) ICC Support, which includes USF-LSS has been superseded by the requirement to file the attached FCC form 481.

Roanoke Telephone Company, Inc. hereby certifies that it has used the federal high-cost support in the preceding calendar year and will use the funds for the upcoming calendar year for the provision, maintenance and upgrading of facilities and service for which such support is intended.

The Company hereby certifies that it has submitted via annual NECA filings, expenditures in support of its universal service filing. USF disbursements received by the Company and other rural incumbent local exchange companies that require state commission certification are divided into **three categories**: High Cost Loop Support ("HCLS"); Safety Net Additive Support ("SNAS"), and the Connect America Fund ("CAF"). The FCC in conjunction with the Federal-State Joint Board on Universal Service has created each of the above mechanisms. This means that representatives from State Commissions have also been involved in the development of these mechanisms through their representation in the Joint Board process.

The Company elected to receive Alternative Connect America Cost Model ("A-CAM") funding beginning in January 2017. This funding was made available by the FCC by WC Docket No. 10-90, Connect America Fund to further the goal of providing robust broadband access throughout the nation. The model support must be elected by state and therefore is distributed to both the Company and its Alabama affiliate National Telephone of Alabama, Inc. evenly by month over a 10-year period. The total for the two Alabama ILECs amounts to \$1.05 million annually. In May of 2018, the FCC extended a second offer for ACAM participants to fully fund the ACAM model which increased the total 10-year funding to \$1.23 million annually with a true up payable in 2018. Electing to receive the A-CAM funding requires that the Company build out cable plant to rural areas to provide a certain level of broadband internet within the funded locations. The first milestone of the buildout obligation will occur at the end of year 4 or 2020 in which 40% of the funded locations could be provided 25/3, 10/1 or 4/1 Mbps internet service. The Company has elected A-CAM and is no longer able to receive High Cost Loop Support (other than any estimated true up amounts in 2017) or Interstate Common Line Support beginning in 2017.

The Company further certifies that it will only use the remaining CAF ICC Support it receives during 2017-2018 for the continued provision, maintenance and upgrading of facilities and service for which such support is intended as described in 47 C.F.R. § 54.101. Those services, which are available to any customer in the Company's service area are: single-party voice grade access to the public switched network, unlimited local usage, dual-tone multi-frequency signaling or its functional equivalent, access to emergency services, including 9-1-1 service or enhanced 9-1-1 service, access to operator service, access to interexchange service, and access to directory assistance, and toll limitation for qualifying low-income customers.

All of these programs are administered through USAC, a private, not-for-profit corporation. USAC assists NECA in data collection necessary for the remittance of universal service funds. This means each company submits, no less frequently than annually, detailed information requested by NECA in the USF data collection process necessary for the remittance of universal service funds.

Rural ILECs must attest to the information submitted. Further, NECA and its auditors must attest to the validity and integrity of NECA's process. In other words, the ILEC cost studies and responses to data collection requests are subject to audit. The information provided in response to all of the universal service fund mechanisms utilizes FCC accounts for regulated costs and must be in compliance with FCC rules in Parts 32, 36, 54 and 64.

All cost studies submitted by rural ILECs and all USF funding received by rural ILECs must be based upon financial statements. In addition, NECA performs focus reviews of cost studies as well as the USF filings for the cost companies involved in the NECA process. In addition, an officer of the rural ILEC must certify to the accuracy and validity of the filed information.

Any questions regarding this submission or the underlying documentation previously submitted to the Commission should be directed to James Garner at (601) 354-9070.

Respectfully Submitted,

ROANOKE TELEPHONE COMPANY, INC.

James Garner

As It: Vice President of Operations

Date: June 25, 2018



## UNION SPRINGS TELEPHONE COMPANY

P. O. BOX 272, UNION SPRINGS, ALABAMA 36089 PHONE (334) 738-4400 FAX (334) 738-5555

July 5, 2018

## VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RE: Union Springs Telephone Company, Inc.'s Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Union Springs Telephone Company, Inc.'s ("Union Springs") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Union Springs is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in Connect America Fund; ETC Annual Reports and Certifications, Report and Order, 32 FCC Rcd 5944 (2017) ("ETC Reporting Streamlining Order") and In the Matter of Connect America Fund, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (334) 738-4400.

Very truly yours,

William H. Freeman

President



# UNION SPRINGS TELEPHONE COMPANY

P. O. BOX 272, UNION SPRINGS, ALABAMA 36089 PHONE (334) 738-4400 FAX (334) 738-5555

## **CERTIFICATION**

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform - Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the previous high-cost funding mechanisms. Eligible applicable to requirements telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Union Springs Telephone Company, Inc. ("Union Springs") certifies compliance in filing its FCC Form 481 for the program year 2019 as required. Union Springs further certifies that all federal high-cost support provided to Union Springs was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Union Springs respectfully requests that the Commission notify the FCC prior to October 1 of this year that Union Springs is eligible to receive federal high-cost support in 2019. Any

questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (334) 738-4400.

Respectfully Submitted,

UNION SPRINGS TELEPHONE COMPANY, INC.

Bv:

William H. Freeman

As Its: President



June 25, 2018

VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RE: Valley Telephone Co., LLC d/b/a Knology or d/b/a WOW! Internet, Cable and Phone's Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Valley Telephone Co., LLC d/b/a Knology or d/b/a WOW! Internet, Cable and Phone's ("Valley") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy of this filing will be delivered to the Commission.

Please be further advised that Valley is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in Connect America Fund; ETC Annual Reports and Certifications, Report and Order, 32 FCC Rcd 5944 (2017) ("ETC Reporting Streamlining Order") and In the Matter of Connect America Fund, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact Arlene Morgan at (706) 645-8116.

Very truly yours,

Bluce Schoonover

Vice President – Regulatory Compliance

Knology, Inc., parent company of Valley Telephone Co., LLC

Enclosure Valley



In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform - Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the applicable to previous high-cost funding mechanisms. requirements telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Valley Telephone Co., LLC d/b/a Knology or d/b/a WOW! Internet, Cable and Phone ("Valley") certifies its compliance in filing its FCC Form 481 for the program year 2019 as required. Valley further certifies that all federal high-cost support provided to Valley was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Valley respectfully requests that the Commission notify the FCC prior to October 1 of this year that Valley is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Arlene Morgan at (706) 645-8116.

Dasportfulls	Submitted,			
VALLEY	TELEPHONE	CO.,	LLC	d/b/a
KNOLOGY	or d/b/a WOW!	INTER	NET, C	ABLE
anid PHON	JEY T			
By:	4-1-			
Beace	e Schoonover			
As Its: Vice	President - Regu	latory C	Complian	ce
Knol	logy, Inc., parent	compan	y of	
Valle	ey Telephone Co.	, LLC		
Date: 41	15/18			

## **APPENDIX "D"**

Hayneville Fiber Transport, Inc. d/b/a

Post Office Box 129 180 Greenville Bypass Greenville, AL 36037



Greenville:

Fort Deposit:

334-371-3000

334-404-4000

334-371-3001

July 6, 2018

Local Service, Long Distance, Internet/DSL

Honorable Walter L. Thomas, Jr., Secretary Alabama Public Service Commission RSA Union Building 100 North Union Street Montgomery, AL 36104

RE: Hayneville Fiber Transport, Inc.'s Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Hayneville Fiber Transport, Inc.'s ("Camellia") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that, in accordance with 47 C.F.R. § 54.313 and the Commission's *Further Report and Order* of September 27, 2016, in Docket No. 25980, Camellia has submitted copies of the FCC Form 481 filed with the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") for the program year 2018, to the Commission's Utility Services Division under separate cover.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (334) 371-3008.

Very truly yours,

Evelyn P. Causey

President and Chief Operations Officer

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform - Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92. 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the previous high-cost funding mechanisms. requirements applicable to telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Hayneville Fiber Transport, Inc. ("Camellia") certifies that it has timely filed its Form 481 for the program year 2019 with the FCC and USAC. Camellia further certifies that all federal high-cost support provided to Camellia was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Hayneville respectfully requests that the Commission notify the FCC prior to October 1 of this year that Camellias eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (334) 371-3008.

Respectfully Submitted,

HAYNEVILLE FIBER TRANSPORT, INC.
By: Culp P. Causey  Evelyn P. Causey
Evelyn P. Causey As Its: President and Chief Operations Officer
Date: 1/6/18



## Via USPS Certified Mail # 7016 3560 0000 3527 7062

June 27, 2018

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554



Re: OMB Control No. 3060-0986 (High-Cost)
OMB Control No. 3060-0819 (Low-Income)

Dear Ms. Dortch:

Pursuant to the requirements of sections 54.313 and 54.422 of the Federal Communications Commission's rules, I hereby certify under penalty of perjury that Troy Cablevision, Inc., as a recipient of federal High-Cost or Low-Income universal service support from the Universal Service Administrative Company, is providing such services in compliance with its High-Cost and Low-Income obligations pursuant to Section 254 of the Communications Act of 1934, as amended.

Sincerely,

TROY CABLEVISION, INC.

William H. Freeman

President

Cc: Pricing Policy Division, Wireline Competition Bureau (Certified Mail # 7016 3560 0000 3527 7079)

Best Copy and Printing, Inc. (Certified Mail # 7016 3560 0000 3527 7055)

Alabama Public Service Commission, Hon. Walter Thomas (Certified Mail # 7016 3560 0000 3527 7048)



May 30, 2018

Hon. Walter L. Thomas, Secretary Alabama Public Service Commission 100 North Union Street RSA Union Building, Suite 850 Montgomery, AL 36130

Re: Docket No. 29540 Certification of Eligibility of Troy Cablevision, Inc. to Receive Federal Universal Service Funds (FUSF) in Study Area 259025 as it applies to the first through Fourth Quarters of 2019.

Troy Cablevision, Inc. ("Company") hereby provides the required certification and requested information regarding the use of support funds to be received in 2019 and the use of funds received in 2017.

On behalf of the Company, I, William H. Freeman, an officer of the Company with substantial knowledge of the Company's operations, do hereby certify under penalty of perjury that the following is true and accurate to the best of my knowledge and belief:

- 1. I am President of Troy Cablevision, Inc.
- 2. The company is certified as a Competitive Eligible Telecommunications Carrier ("ETC") in the exchanges of ETC certified non-rural Incumbent LECs, BellSouth Telecommunications, Inc. d/b/a AT&T Alabama; CenturyTel of Alabama, LLC; and Butler Telephone Company;
- 3. As such, the Company is eligible to receive phased down disbursements from the federal Universal Service Fund in a manner and amount equal to the disbursements received by BellSouth Telecommunications, Inc. d/b/a AT&T Alabama; CenturyTel of Alabama, LLC; and Butler Telephone Company as prescribed by the Federal Communications Commission.
- 4. For funds received in 2016, the Company has utilize all federal High Cost Support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. § 254(e) and 47 U.S.C. § 54.314 of the Telecommunications Act of 1996.
- 5. For funds received in 2018, the Company will utilize all federal High Cost Support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. § 254(e) and 47 U.S.C. § 54.314 of the Telecommunications Act of 1996.

Respectfully Submitted,

William H. Freeman

President